

Exhibit 1

Proposed Order

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

In re)
CITY OF DETROIT, MICHIGAN,) Chapter 9
Debtor.) Case No. 13-53846
) Hon. Steven W. Rhodes
)

**ORDER GRANTING MOTION TO COMPEL THE PRODUCTION OF
DOCUMENTS**

This matter having come before the Court on the motion of Syncora to compel the Debtor to produce documents (the “Motion to Compel”), the Court having reviewed Syncora’s Motion to Compel; and the Court having determined that the legal and factual bases set forth in the Motion to Compel establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. Syncora’s Motion to Compel is GRANTED.
2. The City’s improper objections, as stricken in Exhibit 6 to Syncora’s Motion to Compel, are stricken.
3. The City shall produce documents responsive to Syncora’s requests.
4. To the extent the City withholds documents relating the City’s decision not to sell the art and instead enter into the “Grand Bargain” that it

contends are privileged, the City shall produce a privilege log identifying privileged documents and the basis for the City's claim of privilege

5. The parties are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the motion.

6. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

7. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

IT IS SO ORDERED.

STEVEN W. RHODES
United States Bankruptcy Judge